

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF HELIOS  
VENTURES FZE FOR AN ORDER TO  
TAKE DISCOVERY FOR USE IN  
FOREIGN PROCEEDINGS PURSUANT  
TO 28 U.S.C. § 1782

Case No. 21-MC \_\_\_\_\_

**DECLARATION OF LUCAS BENTO**

Pursuant to 28 U.S.C. § 1746, I, Lucas Bento, declare as follows:

1. I am an attorney duly admitted to practice in New York and before this Court. I am Of Counsel in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Petitioner in this matter.

2. I submit this declaration in support of Helios Ventures FZE (“**Petitioner**”)’s *Ex Parte* Application and Petition For An Order to Conduct Discovery For Use In Foreign Proceedings Pursuant To 28 U.S.C. § 1782 (the “**1782 Application**”). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the 1782 Application and accompanying memorandum of law.

3. Attached as **Exhibit 1** is a proposed order granting Petitioner’s 1782 Application.

4. Attached as **Exhibit 2** are draft subpoenas addressed to Respondents.

5. Attached as **Exhibit 3** is a true and accurate copy of the webpage about VistaJet US Inc., available at <https://www.vistajet.com/en-us/about-us/>.

6. Attached as **Exhibit 4** is a true and accurate copy of the webpage about VistaJet US Inc., available at <https://www.vistajet.cn/en/contact-us/new-york/>.

7. Attached as **Exhibit 5** is a true and accurate copy of a complaint filed by VistaJet US Inc. in *VistaJet US Inc. v. WILD WONDER LLC*, Case No. 1:20-cv-05974-RA (S.D.N.Y), at Dkt. 4.

8. Attached as **Exhibit 6** is a true and accurate copy of the SEC entry for Rhone Capital L.L.C., available at <https://sec.report/CIK/0001469539>.

9. Attached as **Exhibit 7** is a true and accurate copy of Bloomberg entry about Rhone Capital L.L.C., available at <https://www.bloomberg.com/profile/company/500735Z:FP>.

10. Attached as **Exhibit 8** is a true and accurate copy of the SEC entry for Rhone Group L.L.C., available at <https://sec.report/CIK/0001469541>.

11. Attached as **Exhibit 9** is a true and accurate copy of the Bloomberg entry about Rhone Group L.L.C., available at <https://www.bloomberg.com/profile/company/6645196Z:US>

12. No prior application for similar relief has been made by Petitioners.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in New York, New York on May 5, 2021.



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Lucas Bento